

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

DAVONE JACKSON, :
 :
 Plaintiff, :
 :
 VS. : Case No. 3:18-cv-00012
 :
 REAL PAGE, INC. d/b/a :
 LEASING DESK, :
 :
 Defendant. :
 :

CONFIDENTIAL

- - -

ORAL DEPOSITION OF CORPORATE REPRESENTATIVE OF
REALPAGE, INC., PATRICIA BONNER, produced as a witness
at the instance of the Plaintiff, and duly sworn, was
taken in the above-styled and -numbered cause on
December 20, 2018, from 10:36 a.m. to 2:30 p.m., before
Larissa L. McPhearson, CSR in and for the State of
Texas, reported by machine shorthand, at RealPage, Inc.,
2201 Lakeside Boulevard, Richardson, Texas 75082,
pursuant to the Federal Rules of Civil Procedure.

- - -

SUMMIT COURT REPORTING, INC.
Certified Court Reporters and Videographers
1500 Walnut Street, Suite 1610
Philadelphia, Pennsylvania 19102
424 Fleming Pike, Hammonton, New Jersey 08037
(215) 985-2400 * (609) 567-3315 * (800) 447-8648
www.summitreporting.com

PATRICIA BONNER-CONFIDENTIAL

1 Q. Are you familiar with the term "mixed file"?

2 A. Only from the documentation provided on Monday.

3 Q. What is your understanding of what a mixed file
4 is?

5 A. My interpretation would be that it contains
6 more than one type of dispute.

7 Q. Okay. You would agree with me, would you not,
8 that RealPage receives disputes from consumers who claim
9 that RealPage has prepared and sold a report about them
10 that contains criminal history that belongs to another
11 person, correct?

12 A. Correct.

13 Q. Does RealPage have a term or a way that it
14 describes that sort of dispute where a consumer says,
15 you've got criminal history relating to someone else on
16 the report you sold about me?

17 A. Yes.

18 Q. And what does -- what's that term?

19 A. "Nonmatch."

20 Q. Nonmatch. And is that one of the categories
21 that RealPage uses to keep statistics about consumer
22 disputes?

23 A. Yes. It's under the criminal.

24 Q. Let me explore that a little bit. When you
25 say, it's under the criminal, is it fair to say that

PATRICIA BONNER-CONFIDENTIAL

1 practice?

2 MR. RAETHER: Objection to form.

3 A. Yes.

4 Q. And why does RealPage do that?

5 MR. RAETHER: Objection to form, asked and
6 answered.

7 Go ahead.

8 THE WITNESS: Okay.

9 A. To track trends for staffing.

10 Q. So there's no reason for doing it other than
11 the reasons you gave me before when we were talking
12 about searching the G drive?

13 MR. RAETHER: Objection to form, to the
14 extent it goes beyond the topics this witness was
15 identified to address.

16 THE WITNESS: Okay.

17 A. Unless it's requested otherwise, yes.

18 Q. Okay. So turning your attention back to
19 Exhibit 16, I had previously asked you if you could tell
20 me the number of nonmatch disputes that RealPage
21 received in 2017. Does Exhibit 16 help you in doing
22 that?

23 A. Yes, it does.

24 Q. [REDACTED]
25 [REDACTED]

PATRICIA BONNER-CONFIDENTIAL

1 A. [REDACTED]

2 Q. [REDACTED]

3 [REDACTED]

4 A. [REDACTED]

5 Q. [REDACTED]

6 [REDACTED]

7 A. [REDACTED]

8 Q. Okay. Is there any way other than as a
9 nonmatch that a consumer who has information reported
10 about them that belongs to someone else, criminal
11 information, would be classified?

12 A. I don't understand the question.

13 Q. Okay. I can understand why you didn't.

14 We've talked about the classification of
15 nonmatch, referring to a dispute where a consumer has
16 come to RealPage and said, you ran a report about me,
17 it's got criminal history on here that doesn't belong to
18 me, correct?

19 A. Correct.

20 Q. Is there any way other than nonmatch that that
21 situation would be categorized?

22 A. Depending on what verbiage the consumer uses,
23 yes.

24 Q. How else might that be categorized?

25 A. The consumer might say, your report isn't

SUMMIT COURT REPORTING, INC.

215.985.2400 * 609.567.3315 * 800.447.8648 * www.summitreporting.com